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June 19, 2015

Via ECF

United States District Court – District of New Jersey
402 East State Street
Trenton, NJ 08608
Attention: Magistrate Judge Lois H. Goodman

Re: Case: Seeman v. Locane, et al.
Docket No.: 3:10-cv-6597
Our File No.: 019640

Honorable Madam:

As you know, we are the attorneys representing Plaintiffs in the above referenced matter.

We write this letter to apprise the Court, as well as defense counsel who are copied on this letter, that Plaintiff, Fred Seeman, has now amended his Interrogatory Responses to include additional physical injuries which were sustained in the subject accident. These injuries were only recently discovered by his treating physicians and have resulted in Mr. Seeman undergoing surgery at New York Presbyterian Hospital on May 27, 2015.

In light of these additional injuries, as well as the fact that settlement discussions between the parties have not yielded any meaningful progress to date, Plaintiffs are no longer interested in discussing settlement in this matter with Defendants. As such, Plaintiffs respectfully request an opportunity to confer with defense counsel regarding an amended discovery schedule which contemplates the completion of fact and expert discovery in an expeditious fashion, with a goal towards having this case “trial ready” in the near future.

Respectfully submitted,



Raymond C. Silverman

RCS/amm

cc:

Linton Turner, Esq. (via **ECF**)
John E. Lamastra, Esq. (via **ECF**)
Kevin Hart, Esq. (via **ECF**)
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